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9 UNITED STATES BANKRUPTCY COURT
10 NORTHERN DISTRICT OF CALIFORNIA

11 In Re:

Case No. 25-10088 WJL

12 Kingsborough Atlas Tree Surgery, Inc.

Chapter 11

13 Debtor.

Date: July 1, 2025

Time: 9:30 a.m.

14 Ctrm: 1300 Clay St., Room 220
Oakland, CA 94612

15 _____ / Honorable William J. Lafferty

16 RESPONSE TO OMNIBUS OBJECTION
17 TO NOTICE OF INTENT TO ABANDON PERSONAL PROPERTY

18 The equipment Debtor intends to abandon is collateral for a loan held by Commercial
19 Credit Group (“CCG”) with a balance of nearly two million dollars. The equipment is also
20 collateral for a loan held by the SBA and a disputed loan held by the objecting party. Debtor
21 filed motions for authority to sell the equipment Debtor no longer needs to pay down Debtor’s
22 obligation to CCG that continues to accrue interest. The sales would have benefitted the junior
23 secured creditors, as well as the unsecured creditors. Anvil Builders objected to the sales and
24 now objects to abandonment.

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26 The objection to the sales created an unnecessary and wasteful controversy that is best
27 resolved by abandonment of the assets. The abandonment will allow for the sale of the
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1 equipment at either a public or private sale to accomplish Debtor's objective of reducing its
2 obligation to CCG.

3 Dated: June 26, 2025

/s/ Michael C. Fallon

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5 Michael C. Fallon
6 Attorney for Debtor
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